



NRG Montville Operations Inc.
Montville Generating Station
74 Lathrop Road
Uncasville, CT 06382

Main Phone # 860.848.9248
Fax # 860.848.6006

February 13, 2014

Mr. Mark R. Lewis
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, Connecticut 06106

**Subject: Semi-Annual Site Status Update
 Montville Generating Station, Montville Power LLC, Montville, CT**

Dear Mr. Lewis:

Montville Power LLC is submitting the enclosed Semi-Annual Site Status Update for the Montville Generating Station in Montville, Connecticut. This report provides a site status update for the period of July 2013 through December 2013.

"I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify that based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that a false statement in the submitted information may be punishable as a criminal offense, under section 22a-175 of the Connecticut General Statutes, under section 53a-157b of the General Statutes, and in accordance with any other applicable statute."

Should you have any questions or require further information, please call Mr. Ian Cambridge, at (860) 848-6017.

Thank you,

A handwritten signature in blue ink, appearing to read "Jeffrey Araujo", is written over a horizontal line.

Jeffrey Araujo
Eastern Connecticut Plant Manager
Montville Power LLC

Enclosure(s)

cc: Juan Perez, USEPA (e-copy only)
 Bob Spooner, NRG (e-copy only)
 Ian Cambridge, NRG Montville (hard copy and e-copy)
 Andrew D. Walker, LEP, Shaw (e-copy only)
 File (hard copy and e-copy)



Shaw Environmental, Inc.
A CB&I Company
150 Royall Street
Canton, MA 02021
Tel: +1 617 589 5111
Fax: +1 617 589 5495

February 13, 2014

Project #: 1009644010.01000000

Mr. Mark R. Lewis
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, Connecticut 06106

Subject: Semi-Annual Site Status Update
Montville Generating Station
Montville, Connecticut

Dear Mr. Lewis:

On behalf of Montville Power LLC (Montville Power) and its parent company, NRG Energy, Inc. (NRG), Shaw Environmental, Inc. (Shaw), a CB&I Company, has prepared this letter to provide a semi-annual site status update for the subject site. A Site Plan is provided as **Figure 1**. In addition, Shaw is providing the Connecticut Department of Energy & Environmental Protection (CTDEEP) with the schedule for continuing environmental activities at the site. This report covers the period of July 2013 through December 2013.

Environmental activities occurring at the site between July 2013 and December 2013 are described below:

- On March 21, 2013, Montville Power submitted a request for approval of a site-specific Industrial/Commercial Direct Exposure Criteria (I/C DEC) for arsenic. CTDEEP has not formally responded to the request. A conference call was held on February 4, 2014 to review the submittal with CTDEEP. Based on that discussion, Montville Power will revise the I/C DEC approval request and resubmit to CTDEEP in the near future.
- On April 30, 2013, Montville Power submitted a notice for approval to use the Inaccessible Soil Exemption for the soil beneath certain permanent structures at the site. The electronic copy was distributed to CTDEEP and USEPA via email on May 2, 2013. CTDEEP has not formally responded to the notice.
- On July 16, 2013, Montville Power submitted a Preliminary Technical Impracticability Assessment for Groundwater (TI) to CTDEEP and USEPA. The TI was the focus of discussion at the August 22, 2013 meeting between CTDEEP, USEPA, Montville Power, and Shaw. The conceptual site model as presented at that meeting is attached. Based on ideas discussed at the meeting on how to proceed to address impacted groundwater, Shaw will prepare a revised Alternative Surface Water Protection Criterion (ASWPC) request for arsenic. The preparation will be conducted as follows: 1) Shaw will provide CTDEEP with several different methods to calculate the site-specific ASWPC; 2) CTDEEP will review and approve one of the methods assuming they

are reasonable; 3) Shaw will complete the calculation using the approved method; and 4) Shaw will submit the ASWPC request with back-up documentation for review and approval. If this overall approach can demonstrate that groundwater is in compliance with the ASWPC, then it is unlikely that the TI would be pursued any further.

Shaw presented CTDEEP with six methods for the ASWPC calculation in an email dated September 10, 2013. The options were variations of the RSR method per 22a-1333k-3(b)(3). Shaw recommended using the RSR method consisting of multiply the 7Q10 "dilution factor" by the lowest (chronic) aquatic life criteria (salt). The 7Q10 for the Thames River near the subject site is approximately 1,500; however, a value of 10 would be used for the ASWPC calculation as a very conservative safety buffer. Shaw is waiting for a response from CTDEEP before proceeding with the ASWPC calculation.

- No groundwater monitoring was completed during this reporting period.
- The CTDEEP approved the Engineered Control Variance Request in a letter dated September 5, 2013. Montville Power selected H.E. Butler Construction LLC for construction of the Engineered Control. Contractor mobilization is scheduled to begin in the summer of 2014.
- On December 12, 2013, Montville Power submitted a request for a time extension to complete construction of the Engineered Control to CTDEEP. The CTDEEP approval letter for the Engineered Control stated that "implementation of the engineered controls must be completed by December 31, 2013". The project experienced unanticipated delays in the initiation of work due to scoping of potential solar and biomass repowering activities. It was anticipated that the EC installation activities would be coordinated with the repowering activities should they have occurred. In addition, access agreement negotiations with CL&P have been on-going since June 2013 to resolve issues in an easement held by CL&P. CL&P is proposing to remove a large underground electrical cable in the easement during the summer of 2014. The work will be immediately adjacent to the proposed low permeability cap in AOC 9. Montville Power is waiting for a formal response from CTDEEP regarding the request for a time extension through the end of September 2014 to complete the Engineered Control. An email from CTDEEP on January 6, 2014 concurred that an extension will be granted.
- On December 19, 2013, Montville Power submitted documentation to CTDEEP that the public notice process was complete for the Engineered Control. The CTDEEP-approved public notice ran in the local newspaper, *The Day*, on June 20, 2013 followed by a 45-day public comment period. The sign was posted at the facility on October 22, 2013 for 30 days.
- Shaw is currently drafting an application for registration under the *General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities* for the Engineered Control project. The registration will include a Stormwater Pollution Control Plan. NRG anticipates submittal to CTDEEP in February 2014.

SITE SCHEDULE

Outlined below is the site schedule that Montville Power and NRG expect to follow through verification.

Activity	Anticipated Date
Groundwater Monitoring	Q1 2014
Initiate EC	Q2 2014
EC Complete	Q3 2014
EC Completion Report	Q4 2014
Post Remediation Monitoring	2015
ELUR	2015
Public Notice and Partial Verification with Remediation Standards Regulations	2015

NRG will continue to provide updates on the status of response actions at the subject site on a semi-annual basis as requested by CTDEEP. Plans, submittals, and reports will be copied to the USEPA.

If you have any questions regarding this letter or any other site matter, please do not hesitate to call me at 617-589-6143.

Sincerely,



Andrew D. Walker, LEP, LSP
Project Manager
Shaw Environmental, Inc.
A CB&I Company

Phone: 617-589-6143

E-mail Address: Andrew.Walker@CBI.com

Enclosures:

Figures

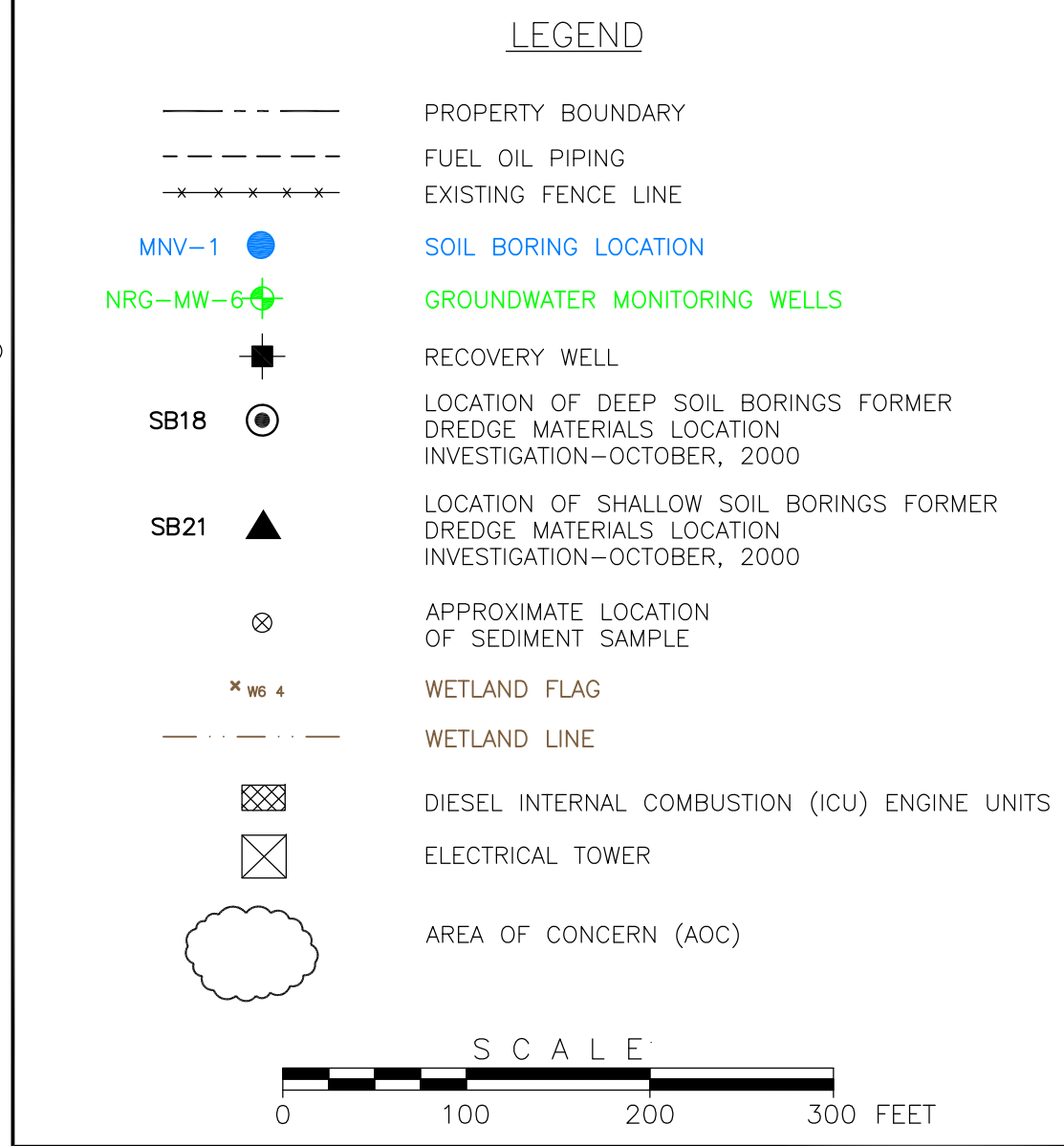
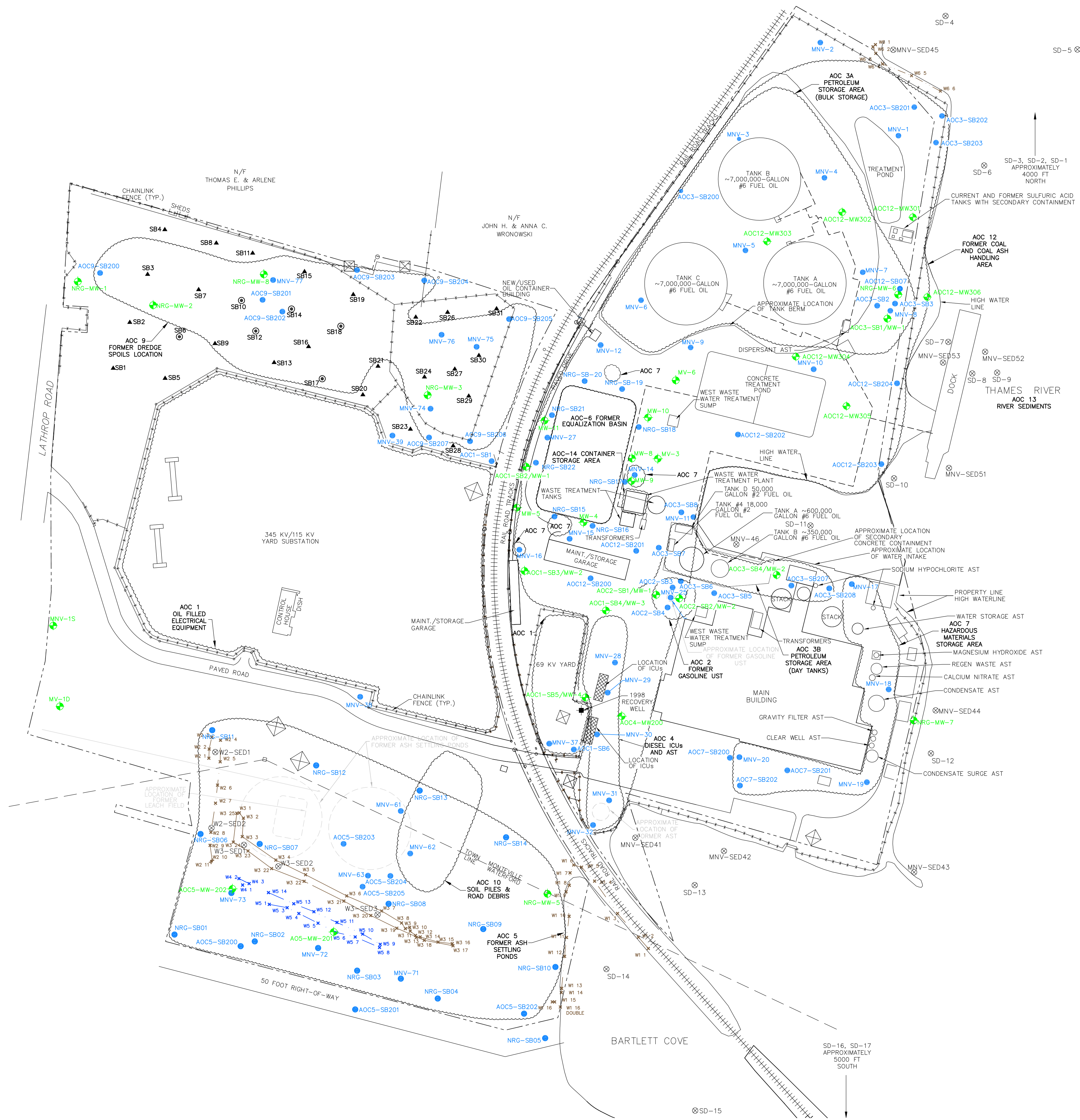
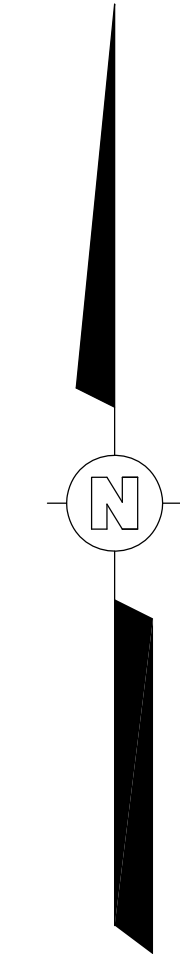
Figure 1 - Site Plan

Attachments

Attachment 1 – Conceptual Site Model

cc: Mr. Ian Cambridge, Montville Power LLC (hard copy and electronic)
Mr. Robert Spooner, NRG (electronic only)
Mr. Juan Perez, USEPA (electronic only)

FIGURES



REFERENCE:

- 1) "FIGURE 6 - PREVIOUS & PROPOSED SAMPLE LOCATIONS OF ENVIRONMENTAL AOC'S NO.3 PETROLEUM BULK STORAGE TANKS". PREPARED BY METCALF & EDDY, DATED JULY 2001. FILE: P:\EVERYONE\NRG\DRAWINGS\MONTVILLE\AOC52-01\AOC3.DGN.
- 2) "EMERGENCY INGRESS AND EGRESS DIAGRAM" JUNE 2006 PREPARED BY NRG MONTEVILLE AND POWER, LLC.
- 3) "FIGURE 2 LOCATION OF ENVIRONMENTAL AREAS OF CONCERN" PREPARED BY METCALF AND EDDY, DATED APRIL, 2001.
- 4) FIELD SURVEY CREATED BY NAFIS AND YOUNG MAY 31, 2006.
- 5) FIELD SURVEY PLAN CREATED BY TIBBETS ENGINEERING CORPORATION ENTITLED "EXISTING CONDITIONS", DATED 7/10/07.



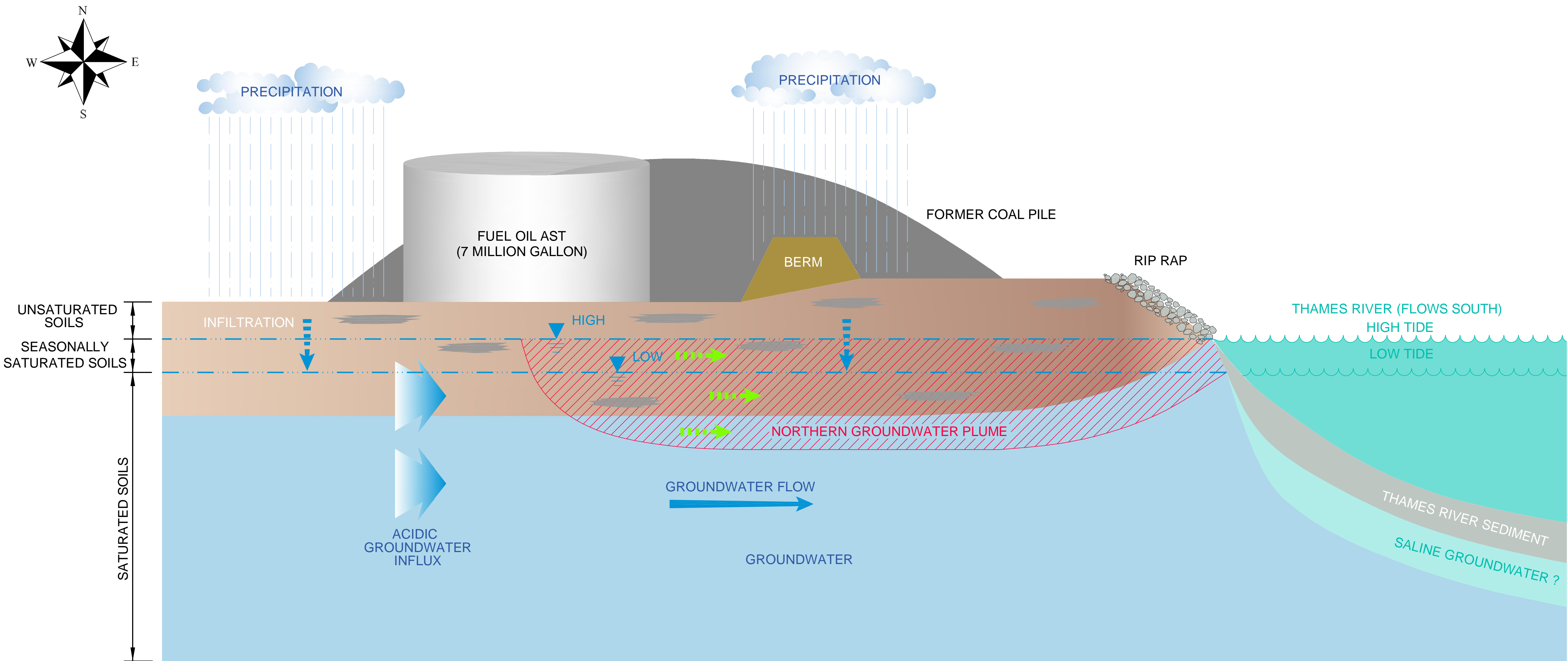
SHAW ENVIRONMENTAL, INC.,
A CB&I COMPANY
150 ROYALL STREET
CANTON, MASSACHUSETTS
(617) 589-5111

FIGURE 1

SITE PLAN

MONTVILLE GENERATING STATION
MONTVILLE AND WATERFORD, CONNECTICUT

ATTACHMENTS



THIS CONCEPTUAL SITE MODEL (CSM) IS A SYNTHESIS OF INFORMATION PREVIOUSLY PRESENTED.

SOURCES OF INFORMATION USED:

- PHASE III REPORT
- PRELIMINARY TECHNICAL IMPRACTICABILITY ASSESSMENT FOR GROUNDWATER
- PROFESSIONAL JUDGMENT

THIS DRAWING PRESENTS A CSM OF THE HYDROLOGIC SETTING, CONTAMINANT SOURCES, RELEASE MECHANISMS AND TRANSPORT PATHWAYS, AND PLACES THEM IN A SPATIAL CONTEXT. IT PRESENTS A VISUAL SUMMARY OF ESTIMATED PROCESSES THAT OCCUR AT THE SITE.


LEGEND:

- COARSE SOIL IMPACTED WITH COAL AND COAL ASH (DARKER BROWN IS MORE IMPACTED THAN LIGHTER BROWN)
- FINE SOIL IMPACTED WITH COAL AND COAL ASH
- DIRECTION OF GROUNDWATER FLOW
- INFILTRATION FROM PRECIPITATION AND LEACHING OF METALS (CURRENT AND HISTORIC)
- MOBILIZATION OF METALS DUE TO ACIDIC GROUNDWATER INFLUX
- GROUNDWATER TABLE

NOTE:

MORE THAN 10X VERTICALLY EXAGGERATED CROSS SECTION OF THE SITE, LOOKING NORTH.

"NOT TO SCALE"

		SHAW ENVIRONMENTAL, INC. A CB&I COMPANY 150 ROYALL STREET CANTON, MA 02021			
DESIGNED BY: <i>RP</i>		MONTVILLE GENERATING STATION MONTVILLE, CONNECTICUT			
DRAWN BY: <i>GJ</i>					
CHECKED BY: <i>AW/VT</i>		MONTVILLE POWER, LLC CONCEPTUAL SITE MODEL NORTHERN PLUME			
APPROVED BY: <i>AW</i>					
DATE: 8/14/13		SCALE: NA	DRAWING NO. 1009654011-D3		SHEET NO. 1